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January 14, 2000

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Via Federal Express

CHAMBERLAIN MANUFACTURING CO.  
c/o Mr. Craig Zimmerman, Esq.  
McDermott, Will & Emery  
227 West Monroe Street  
Chicago, IL 60606-5096

Re: 2005 South 19<sup>th</sup> Street, Clinton, Iowa;  
Notice of Intent to Bring RCRA Citizen Suit

Dear Sir:

As you know, we represent Collis Inc., a Delaware corporation that has its principal place of business at 2005 South 19<sup>th</sup> Street, Clinton, Iowa ("the Site"). Chamberlain Manufacturing was the previous owner and operator of this Site, and a party to certain RCRA administrative proceedings and related state court litigation.

On behalf of Collis Inc., we hereby provide Notice of our client's intent to file suit against your client pursuant to Section 7002 of the Resource Conservation and Recovery Act ("RCRA"), 42 USC § 6972. We will seek a Court order for the following: injunctive relief to abate and clean up the contamination from the surface impoundments and other waste management areas; civil penalties for violations of RCRA; recovery of response and corrective action costs incurred by Collis Inc. in performing the RFI/CMS and implementing the Corrective Action Plan, and addressing the related groundwater monitoring, sludge removal, and releases of hazardous materials and hazardous constituents at the Site; Collis Inc.'s costs of the litigation, including attorneys' fees and expert witness fees; and such other relief as may be appropriate under the RCRA statute.

This Notice is hereby provided pursuant to the statutory requirement that notice be given to intended defendants, U.S. EPA, and the State, ninety (90) days prior to a claim being brought under RCRA §7002. 42 USC §6972(b)(2)(A). Collis Inc. asserts that your client is a person alleged to have "contributed or who is contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste which may present an imminent and substantial endangerment to health or the environment." 42 USC § 6972(a)(1)(B). As provided by the RCRA statute, this Notice is also given to the Administrator of the U.S. Environmental Protection Agency (EPA) and to the Iowa Department of Natural Resources (DNR) on behalf of the State.

Mr. Craig Zimmerman, Esq.  
January 14, 2000  
Page 2

You have previously received communications and other information from us regarding the environmental contamination at issue, including, but not limited to, the Iowa State Court 1996 Amended Petition For Declaratory Judgment, Indemnification, and Other Relief (Case # LACV 020239). These pleadings set forth some of the bases for Collis Inc.'s belief regarding Chamberlain Manufacturing's activities "which may present an imminent and substantial endangerment to health or the environment" within the meaning of the RCRA statute. Your client's waste management and disposal activities at the Site have caused the soils and groundwater contamination being addressed by Collis Inc. As you are aware, the U.S. EPA has overseen and directed the clean-up activities undertaken and ongoing by Collis Inc. to address the contamination at issue.

This Notice, within the meaning of the RCRA statutory provisions, sufficiently states the grounds for Collis Inc.'s Complaint pursuant to RCRA § 7002 which we intend to file against Chamberlain Manufacturing. If, however, you need more information, have any questions, or wish to discuss this matter further, please contact the undersigned as legal counsel for Collis Inc.

Very truly yours,

VARNUM, RIDDERING, SCHMIDT & HOWLETT<sup>LLP</sup>



Charles M. Denton

CMD/pjd

c: Carol M. Browner, U.S. EPA Administrator  
Dennis Grams, U.S. EPA Regional Administrator  
Paul W. Johnson, Iowa DNR Director